

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

IN RE: ETHICON, INC., PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION	Master File No. 2:12-MD-02327 MDL 2327 JOSEPH R. GOODWIN U.S. DISTRICT JUDGE
THIS DOCUMENT RELATES TO ETHICON WAVE 1 CASES	

**CROSS NOTICE OF DEPOSITION OF ERIN CAREY, M.D.
ON SEPTEMBER 24, 2015 AT 1:00 P.M. CENTRAL STANDARD TIME**

TO: ALL COUNSEL OF RECORD

PLEASE TAKE NOTICE that the deposition of ERIN CAREY, M.D., will be taken jointly in connection with *In Re: Ethicon, Inc., Pelvic Repair System Products Liability Litigation*, MDL No. 2327 (Wave 1 Cases), United States District Court, Southern District of West Virginia and *Mullins v. Ethicon, Inc., et al.*, Southern District of West Virginia, case No. 2:12-MD-02952, upon oral examination on September 24 at 1:00 p.m. CST, at the offices of Wagstaff & Cartmell LLP, 4740 Grand Avenue, Suite 300, Kansas City, Missouri 64112.

PLEASE TAKE FURTHER NOTICE that in accordance with Rule 30 of the Federal Rules of Civil Procedure, the procedures set forth *In Re: Ethicon Inc., Pelvic Repair System Products Liability Litigation*, MDL No. 2327, Plaintiffs hereby cross-notice this deposition for any and all purposes permitted by the Federal Rules of Civil Procedure, the rules of the MDL Court, and any other state or local rules that apply to this action. Plaintiffs further state that this deposition shall be conducted in accordance with and subject to the Protective Orders entered *In Re: Ethicon Inc., Pelvic Repair System Products Liability Litigation*, MDL No. 2327.

This deposition will be taken before a person authorized by law to administer oaths and be recorded by stenograph.

Dated: September 15, 2015

PLAINTIFFS' CO-LEAD COUNSEL

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